

# EXHIBIT L

Page 1	Page 3
<p>1</p> <p>2 UNITED STATES DISTRICT COURT</p> <p>3 DISTRICT OF MINNESOTA</p> <p>4 Case No. 0:18-cv-01776-JRT-HB</p> <p>5 -----</p> <p>6</p> <p>7 IN RE:</p> <p>8 PORK ANTITRUST LITIGATION</p> <p>9</p> <p>10 -----</p> <p>11</p> <p>12</p> <p>13</p> <p>14 REMOTE VIDEO DEPOSITION OF SANDRA STEFFEN</p> <p>15</p> <p>16 Friday, April 29, 2022</p> <p>17 11:00 a.m. (PT)</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22 Reported by:</p> <p>23 Joan Ferrara, RMR, FCRR</p> <p>24 Job No. 2022-837310</p> <p>25</p>	<p>1</p> <p>2 REMOTE APPEARANCES:</p> <p>3</p> <p>4 KIRKLAND &amp; ELLIS LLP</p> <p>5 Counsel for Clemens Food Group, LLC and The</p> <p>6 Clemens Family Corporation</p> <p>7 60 East South Temple Street</p> <p>8 Salt Lake City, Utah 84111</p> <p>9 BY: BRYANT WATSON, ESQ.</p> <p>10 JENNA STUPAR, ESQ.</p> <p>11</p> <p>12</p> <p>13 GUSTAFSON GLUEK PLLC</p> <p>14 Counsel for Consumer Indirect Purchasers and</p> <p>15 The Witness</p> <p>16 120 South 6th Street</p> <p>17 Suite 2600</p> <p>18 Canadian Pacific Plaza</p> <p>19 Minneapolis, Minnesota 55402</p> <p>20 BY: LING S. WANG, ESQ.</p> <p>21</p> <p>22</p> <p>23 ALSO PRESENT:</p> <p>24 CAYLOB SUAREZ, Videographer</p> <p>25</p>
Page 2	Page 4
<p>1</p> <p>2</p> <p>3</p> <p>4 April 29, 2022</p> <p>5 11:00 a.m. (PT)</p> <p>6</p> <p>7</p> <p>8</p> <p>9 Videotaped Deposition of SANDRA</p> <p>10 STEFFEN, held remotely via Zoom, before</p> <p>11 Joan Ferrara, a Registered Merit Reporter,</p> <p>12 Federal Certified Realtime Reporter and</p> <p>13 Notary Public.</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1</p> <p>2 ----- I N D E X -----</p> <p>3 WITNESS EXAMINATION BY PAGE</p> <p>4 SANDRA STEFFEN MR. WATSON 6</p> <p>5</p> <p>6</p> <p>7 DOCUMENT REQUEST: PAGE</p> <p>8 1) Three receipts not already</p> <p>9 produced 77</p> <p>10</p> <p>11</p> <p>12 ----- EXHIBITS -----</p> <p>13 STEFFEN FOR ID.</p> <p>14 (PROVIDED ELECTRONICALLY TO REPORTER)</p> <p>15 Exhibit 1 Resumé of Sandra Steffen 27</p> <p>16 Exhibit 2 Document 32</p> <p>17 Exhibit 3 Receipts 63</p> <p>18 Exhibit 4 Receipts 71</p> <p>19 Exhibit 5 Receipt 73</p> <p>20 Exhibit 6 Updated Resumé of Sandra</p> <p>21 Steffen 90</p> <p>22 Exhibit 7 Bankruptcy petition 99</p> <p>23</p> <p>24</p> <p>25</p>

Page 73

1 **S. STEFFEN**2 **buy 10 items, get for them \$1 apiece and**  
3 **you're getting 50 cents off each item.**4 **And those items are usually**  
5 **indicated on your receipt that -- like if**  
6 **you look up above, it says E-coupon Coke.**  
7 **They had an E-coupon. This could have been**  
8 **a regular sale price, you know, just a**  
9 **weekly sale price. It wasn't like a coupon**  
10 **or special promotion.**11 Q. Are the sale prices always  
12 reflected in the receipt or are they --  
13 strike that.14 Are the sale prices always  
15 reflected in the receipts?

16 MS. WANG: Object to form.

17 **A. Don't know.**18 Q. That's all I have on that  
19 exhibit.20 MR. WATSON: We'll move to the  
21 next. It's going to be Tab 6 for you,  
22 Ms. Steffen.23 (Steffen Exhibit 5, Receipt,  
24 remotely introduced and provided  
25 electronically to the reporter.)

Page 75

1 **S. STEFFEN**2 **that the date was unreadable.**3 **Yeah, this is the one that -- you**  
4 **can't read the date. The date should be --**  
5 **the date should be below where it says**  
6 **"Ralph's Reward Savings" down at the**  
7 **bottom. Right underneath that is a receipt**  
8 **and it's dated apparently.**9 **However, I did find this receipt**  
10 **attached to my credit card statement and**  
11 **the date on the amount of this purchase, on**  
12 **the credit card statement, it said it was**  
13 **12/16/17.**14 Q. And what is it that you pulled  
15 the receipt out of, the original receipt,  
16 the folder?17 **A. Oh, that's just my folder that**  
18 **goes in my file cabinet for this**  
19 **litigation.**20 Q. What other documents do you have  
21 in that folder?22 **A. I have additional receipts. I**  
23 **have a copy of the Fourth Amended**  
24 **Complaint. I have a copy of a**  
25 **questionnaire that I --**

Page 74

1 **S. STEFFEN**2 **A. Uh-huh, yes.**

3 Q. Does Tab 6 have a timestamp?

4 **A. I can't read it if it does.**5 Q. Or does it have a date stamp  
6 reflecting when this purchase was made?7 **A. I don't see it on here.**

8 Q. Do you recall --

9 **A. My original receipt may show it.**10 Q. Is the balance reflected for this  
11 receipt \$51.78?12 **A. Yeah.**13 Q. And is this a receipt that you  
14 produced to counsel?15 **A. Yes.**16 Q. Do you have any memory of when  
17 you made this purchase?18 **A. Can I look at my receipts that I**  
19 **have, my originals?**

20 Q. Sure.

21 **A. Okay. Then I can be a little bit**  
22 **more clear about what's going on with this**  
23 **receipt. Because no, I don't have a memory**  
24 **of this purchase. However, this may be a**  
25 **receipt -- there was one receipt that I had**

Page 76

1 **S. STEFFEN**2 MS. WANG: Ms. Steffen -- Sandy,  
3 I don't think we need to get into  
4 everything that counsel --5 **THE WITNESS: That's it.**6 MR. WATSON: Counsel, can you  
7 stick to speaking objections, to form?8 MS. WANG: And I also just want  
9 to caution the witness to the extent  
10 that any of those documents are  
11 communications between you and  
12 counsel, please do not reveal that.13 Q. How many receipts do you have in  
14 there?15 **A. I have five -- eight total.**16 Q. And do all of those receipts show  
17 pork purchases?18 **A. Yes.**19 Q. And did you give those receipts  
20 to your counsel for production?21 **A. All but three.**22 Q. Is there a reason you did not  
23 give the other three receipts to your  
24 counsel?25 **A. I was advised just to hold on to**

Page 77

1 **S. STEFFEN**2 **them.**

3 Q. Who advised you to do that?

4 **A. My attorneys.**5 Q. I believe we have one more  
6 exhibit to do. One moment.7 MR. WATSON: We'll request those  
8 additional three receipts formally  
9 from your counsel and we can address  
10 this issue off the record afterwards  
11 if that works for opposing counsel.12 MS. WANG: Certainly, but I do  
13 want to represent to you that any  
14 documents that were responsive were  
15 produced, so.16 Would now be a good time to take  
17 a quick lunch break?18 MR. WATSON: I actually think  
19 that we could probably push through  
20 and get done within the next probably  
21 45 minutes to an hour, but we could  
22 also take the lunch break if  
23 Ms. Steffen would like to.

24 MS. WANG: Sandy --

25 **THE WITNESS: I kind of got lost**

Page 79

1 **S. STEFFEN**

2 (Recess taken from 1:05 p.m. to

3 1:27 p.m. PT)

4 **THE VIDEOGRAPHER: The time is**5 1:27 p.m. We are now back on the  
6 record.7 **BY MR. WATSON:**8 Q. Besides your counsel, have you  
9 discussed this lawsuit with anyone else?10 **A. No.**11 Q. Have you read any press releases  
12 or newspaper articles regarding this  
13 lawsuit?14 **A. No.**15 Q. In your own words, what is this  
16 case about?17 **A. It's my understanding that the**  
18 **Defendants conspired to restrict the supply**  
19 **of pork which consequently inflated the**  
20 **price to consumers.**

21 Q. And who are the Defendants?

22 **A. Agri Stats, Hormel, Tyson,**  
23 **Clemens, Smithfield, JBS -- there's**  
24 **probably others that just aren't popping**  
25 **into my head at the moment.**

Page 78

1 **S. STEFFEN**2 **in all that.**3 MR. WATSON: I have about 45  
4 minutes left. Would you prefer to  
5 push through and wrap up or would you  
6 prefer to take lunch?7 **THE WITNESS: I would like to**  
8 **take some sort of break. It doesn't**  
9 **have to be, for my part it doesn't**  
10 **have to be very long, if we're going**  
11 **to wrap this up fairly soon, but I**  
12 **would like to take a quick break.**13 MR. WATSON: Absolutely. Why  
14 don't we go ahead and take a quick  
15 break. How long do you want,  
16 Ms. Steffen?17 **THE WITNESS: Ling, it's up to**  
18 **you.**19 MS. WANG: You know, why don't we  
20 take like a 15-minute break. Does  
21 that work?

22 MR. WATSON: Perfect. Thanks.

23 **THE VIDEOGRAPHER: The time is**  
24 1:05 p.m. We are now going off the  
25 record.

Page 80

1 **S. STEFFEN**2 Q. When do you understand -- strike  
3 that.4 In your view, when did the  
5 alleged conspiracy begin?6 MS. WANG: Object to form.  
7 Foundation.8 **A. I have seen in pleadings, I**  
9 **believe, that as early as 2009.**10 Q. In coming to reach an  
11 understanding about this case, have you  
12 relied on any other documents other than  
13 those provided to you by your attorneys?14 **A. I'm sorry, could you repeat that?**15 Q. You stated earlier an  
16 understanding of this case and an alleged  
17 conspiracy. How did you come to reach that  
18 understanding?19 **A. Through discussions with counsel.**20 Q. Have you read any legal documents  
21 filed in this case?22 **A. Yes.**

23 Q. Which ones?

24 **A. I believe the first document was**  
25 **the Second Amended Complaint -- no, no --**